

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NOTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

In RE: )  
Laura P. Rios ) Case No: 18-33924  
Debtor ) Chapter: Chapter 13  
Judge: Janet S. Baer

**NOTICE OF MOTION**

TO: Laura P. Rios, 910 Rainbow Terrace, South Elgin, IL 60177  
Glenn B. Stearns, 801 Warrenville Road, Suite 650, Lisle, IL 60532  
Office of the US Trustee, 219 S. Dearborn, Room 873, Chicago, IL 60604  
Cutler & Associates LTD, 4131 Main St, Skokie, IL 60076  
SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on **Friday, July 9, 2021 at 9:30 a.m.**, I shall appear before the Honorable Janet S. Baer in 219 S. Dearborn Street, Courtroom 615, Chicago, IL 60604, or any judge sitting in that judge's place, and then and there present the motion of the Debtor, Laura Rios, for **MOTION TO SUBSTITUTE RONALD P. STROJNY, JR., AS ATTORNEY FOR DEBTOR** a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is **160 731 2971** and the password is **587656**. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you may file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Ronald P. Strojny, Jr.  
**Ronald P. Strojny, Jr., Attorney for Debtor**  
5839 W. 35th Street  
Cicero, IL 60804  
(Phone) 708-652-2800

**CERTIFICATE OF SERVICE**

I, Ronald P. Strojny, Jr., an Attorney, certify that I served a copy of this notice and the attached MOTION TO SUBSTITUTE RONALD P. STROJNY, JR., AS ATTORNEY FOR DEBTOR on each entity shown on the attached LIST OF ALL CREDITORS at the address shown by causing the same to be mailed in a properly addressed envelope, postage prepaid, in the U.S. mail at 5839 W. 35th Street, Cicero, IL 60804, and, via electronic notice through ECF to the Office of the U.S. Trustee, Cutler & Associates, LTD, and, Chapter 13 Trustee before the hour of 11:59 p.m., on July 1, 2021.

By: /s/ Ronald P. Strojny, Jr.  
Ronald P. Strojny, Jr.

**Attorney for the Debtor**

Attorney Ronald P. Strojny, Jr.  
5839 W. 35<sup>th</sup> Street  
Cicero, IL 60804  
(Phone): 708-652-2800

**LIST OF ALL CREDITORS**

Aargon Agency  
Attn: Bankruptcy Department  
8668 Spring Mountain Rd  
Las Vegas, NV 89117

BMO Harris Bank  
Attn: Bankruptcy  
PO Box 2035  
Milwaukee, WI 53201

Bnqtfin  
607 Dundee Ave  
Elgin, IL 60120

Caine & Weiner  
Attn: Bankruptcy  
PO Box 5010  
Woodland Hills, CA 91365

Clerk, Third Municipal Division  
Doc # 18M3004020  
2121 Euclid Ave #121  
Rolling Meadows, IL 60008

Cnac Dundee Inc  
750 Dundee Ave  
Dundee, IL 60118

Commonwealth Edison  
3 Lincoln Center, 4th Floor  
Oakbrook Terrace, IL 60181

Credit Acceptance  
25505 West 12 Mile Road  
Southfield, MI 48034

Credit One Bank  
Po Box 98873  
Las Vegas, NV 89193  
Dept of Ed / Navient  
Attn: Claims Dept  
PO Box 9635  
Wilkes Barre, PA 18773

First Premier Bank  
3820 N Louise Ave  
Sioux Falls, SD 57107

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Lead Bank  
200 N 3rd St  
Garden City, MO 64747

Markoff Law LLC  
29 N Wacker Dr #1010  
Chicago, IL 60606

MidAmerica Bank & Trust Company  
Attn: Bankruptcy  
PO Box 400  
Dixon, MO 65459

Midnight Velvet  
Swiss Colony/Midnight Velvet  
1112 7th Ave  
Monroe, WI 53566

Navient  
Attn: Bankruptcy  
PO Box 9000  
Wilkes Barre, PA 18773

Navistar Financial Corp  
Attn: Bankruptcy Dept  
PO Box 96070  
Chicago, IL 60693

Portfolio Recovery  
PO Box 41021  
Norfolk, VA 23541

Ttl Fin Ac  
2900 West Irving Park  
Chicago, IL 60618



IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NOTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In RE:	)	
Laura P. Rios	)	Case No: 18-33924
	)	Chapter: Chapter 13
Debtor	)	
	)	Judge: Janet S. Baer

**MOTION TO SUBSTITUTE RONALD P. STROJNY, JR., AS ATTORNEY FOR  
DEBTOR**

Ronald P. Strojny, Jr., having been retained by Debtor, and having been requested by Debtor in this case for representation in these proceedings, respectfully moves this Honorable Court to enter an Order for substitution of attorneys, and in support thereof states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b)(2).
2. The Debtor filed a Chapter 13 petition under 11 U.S.C. Section 101, et Seq. on 12/07/2018, case number 18-33924.
3. The attorneys of record for Debtor are currently Cutler & Associates LTD, 4131 Main St, Skokie, IL 60076.
4. Debtor has approached attorney Ronald P. Strojny, Jr., and sought representation in these proceedings and has requested that said attorney file an appearance on her behalf.

5. That said law office therefore requests that the attorneys of record in the above-captioned proceeding be substituted with attorney Ronald P. Strojny, Jr.

WHEREFORE, the Debtor, Laura P. Rios (the "Debtor"), by and through her attorney, Ronald P. Strojny, Jr., prays this Court enter an order substituting attorney Ronald P. Strojny, Jr. as attorney of record; and for such other and further relief this Court may deem just and equitable.

/s/ Ronald P. Strojny, Jr.  
Ronald P. Strojny, Jr., *Attorney for Debtor*

**Attorney for the Debtor**

Ronald P. Strojny, Jr.  
5839 W. 35<sup>th</sup> Street  
Cicero, IL 6004  
(Phone) 708-652-2800  
(Fax) 708-652-2840